

Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 1 of 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

KENNETH J. WASHINGTON

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:16-cv-629-TSL-JCG

SHERIFF HAROLD JONES ET AL.

DEFENDANT

MOTION TO CORRECT AND AMEND COMPLAINT

Come now Kenneth J. Washington, by and through Pro Se, filed this
Motion to Correct and Amend 8th amendment complaint.

Complaint

On the 17th day of June, 2013, Kenneth J. Washington was assaulted and arrested under 97-35-7-15 disturbing the peace and confined in Copiah County Detention Center without bond. On the 18th day of June, 2013 Monchelle Williams brought Kenneth J. Washington PTSD medication to Copiah County Detention Center which was refused by the jailers which Ms. Williams and Annette Washington called Sheriff Harold Jones asked why Kenneth J. Washington could not have his prescription medication the same day, which Sheriff Harold Jones stilled denied and disregard the medical treatment of Washington. Monchelle Williams and Annette Washington called Sheriff Harold Jones for several days until Kenneth Washington medication was accepted by the jailers. After Washington

Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 2 of 10

Prescription medication was accepted and entrusted to jailers Ursula Davis Kinzie who dispense the prescription medication in the morning time for the jailers who distributed the prescription medicine assisted by Inmates during feeding in the evening under the administration of Jail Administrator Millerson Black and Sheriff Harold Jones. During my stay At Copiah County Detention Center I received prescription medication From jailers: Lashunda Bell, Katrice Williams, Nadine Sutton Joiner, Dixon, Ursula Kinzie, Zeke, Bertha, which during my stay at CCDC these Individual rotated or work in the place of a fellow employee. My Medication entrusted to Ursula Kinzie was kept in a room in which trusty Inmates also had access to for different supplies. In the beginning I Received my medication as it was provided on the form which I had to Initial indicating I received the medication but in the Month of July 2013, My pain killer was missing but the form indicated that it was in the Variety of pills that I received for PTSD and other illness. This incident Was mention to jailer Kinzie and the prescription was refilled and again By Monchelle Williams and brought back CCDC which the same thing Occurred at the end of July and the beginning of August 2013 60 pills Gone which I was only allowed to have only 1 a day whether I was in Pain or not. After I complained about the pain I was having for several Days the Sheriff had the prescription refilled again which it lasted a week

Or two then the medication was missing again which the medical form indicated it was there so I refused to signed which Jailer Katrice Williams informed me that she could not give me the rest of my medicine unless I Signed which she indicated to write on the side that it was not there because the medication be fixed prior to her coming to work and she would not know one from the other. The signing on side of the form went on for a week or two which I complained again about the pain I was in which jailer Ursula Kinzie told me that the Sheriff would not authorize another refill of your pain killers because they were to high and the only thing they would provide is Tylenol P.M. which I told Jailer Kinzie I was allergic to Tylenol and the prescription was not refilled and I Suffered in pain the rest of the Month of August and September until I was bonded out.I had over a 120 pain killers which I had no access to And one took one a day provided by the jailers which nether Sheriff Harold Jones ,Jail Administrator Millerson Black or none of the jailers Can account for my missing or stolen medication which the sheriff tried To substitute with Tylenol P.M. which could have been fatal to my health Which the Sheriff and his staff disregard my medical treatment after my Meds were stolen in which they had a obligation to provide me with Adequate medical treatment or care which they clearly denied me my Right to be free from cruel and unusual provided by the 8th amendment.

Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 4 of 10

(2.) On the 17th day of June, 2013 I, Kenneth J. Washington was confined without no bond in which I was placed in cell block 49 which the condition was cruel and inhumane for housing inmates which black mold filled the walls of the cell block where the inmates slept and the shower/ bathroom were even worse in which the black mold covered the sink, toilet, shower and walls and grew each day from the moisture it held when an inmate took a shower because the shower nor the cell block had any proper ventilation for fresh air for cell block or the shower to keep the moisture out which harmful bacteria infection like staph harbors these kind of condition that could be fatal to inmates future health and safety.

Already confined in cruel and inhumane conditions at CCDC, about the end of August or the beginning of September 2013 cell block 49 flooded with feces and sewage water which myself and 8 or 9 inmates were moved to a lock down cell that held the capacity of 4 now housed 9 or 10 inmates which we stayed for one day and moved back to cell block 49 where the zone was still flooding with feces and sewage water which jail Administrator Millerson Black told the trusty to go get a squeegee, mop, broom and mop bucket so that we could keep the cell block from flooding. Which the plumbers told jail Administrator Millerson Black that the flooding would not stop because the pipes had collapsed underground beneath the jail and they would have to schedule a tanker truck to suck

out the feces and sewage. I, Kenneth J. Washington and the other inmates ate, slept and shower in these conditions for several days which we took turns keeping the feces and sewage water down, which the Jail Admin. Millerson Black had the knowledge that feces and sewage water wouldn't stop flooding in which she disregarded the health and safety of myself and the other inmates entrusted in their care to be housed in adequate and suitable living conditions which it was denied by Millerson Black when she housed myself and the other inmates in the punitive conditions of cell block 49 with the personal knowledge of the black mold, corrosion and flooding of feces and sewage water which she knew would not stop because the pipes had collapsed beneath the jail which one side had no proper plumbing at all which subject myself and other to cruel and unusual punishment under the 8th amendment. Millerson Black is the Jail Administrator and could have reported the punitive conditions of the Jail, which Millerson Black Colluded with Sheriff Harold Jones to allow inmates to be held and housed in cruel and inhumane conditions with the risk of pervasive harm of bacteria infection that could be fatal to the health and safety of myself and the other inmate entrusted in their care.

(3.) In the Month of September 2013, I Kenneth J. Washington was released from Copiah County Detention Center which as I recall the conditions of the jail was cruel and inhumane and unsuitable for housing

Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 6 of 10

Inmates, which the jail was filled with black mold and corrosion in each Cell block plus the pipes had collapsed beneath the Copleah County Detention Center which one side of the jail had no working plumbing and the sewage filled the ground under the jail because of the collapsing pipes Which local plumbing company Pat and Jimmy plumbing service was Called in between the end of August or the first of September for the jail Flooding which could not be stop for several days which the line had to Be vacuum out by a tanker truck. I got out about the second week of September, 2013 and the broken pipes beneath the jail were still collapsed Because the only way they could be fixed the concrete beneath the jail Would have to busted open to determine the location of the collapsed pipe or pipes and the black mold still harbored the cell blocks and Showers of CCDC. In the Month of October 2013, Sheriff Harold Jones and the Board of Supervisors had to tour the jail and report their finding to the Grand Jury of Copleah County Circuit Court which each party in their official capacity colluded that the Copleah County Detention Center was suitable for housing inmates, which Sheriff Harold Jones and The Board of Supervisors of Copleah County had the personal knowledge That the pipes beneath the jail had collapsed which the Copleah County Board of Supervisors had to authorized the payment for the work order From Pat and Jimmy Plumbing service for the previous work order

Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 7 of 10

mention earlier in the complaint. In the local newspaper of Copiah County in the Month of October , 2013 Foreperson for the Grand Jury concurred the suitable conditions of CCDC which the jail still had the collapsed pipes beneath the jail and the black mold, corrosion, bacteria infections that still harbored the facility which it shows that the Board Of Supervisor had the knowledge of the punitive conditions of the jail which they also disregarded the health and safety of the inmates with the Knowledge of the same that the conditions were inhumane.

CLAIMS

These claims are made against Sheriff Harold Jones, jail admin. Millerson Black and the Board of Supervisors of Copiah County In their Official Capacity.

- 1.) Sheriff Harold Jones denied me adequate medical treatment or care Causing me to suffer mental,emotional stress and pain which I endured Whiled being denied my prescription medication which a clear denial of due process which resulted into a violation of my 8th amendment rights
- 2.) Under the Administration of Sheriff Harold Jones and Jail Admin. Millerson Black unlicense and uncertified individual were entrusted with Prescription medication which was stored in a unsecured location in Which trusty inmates also had access to as well which resulted in my Medication being stolen which I had to endure my pain without the Proper treatment which I suffered and after denying me refilled of my

Medication the sheriff tried to substitute a pain killer with a Tylenol P.M. which could have been fatal to my health and safety.

3.) Sheriff Harold Jones, Board Of Supervisors and Jail Administrator Millerson Black knowingly and willingly allowed myself and other inmates entrusted in their care to be housed in cruel and inhumane conditions with the knowledge that the conditions were unsuitable and punitive for housing inmates which ether party could have reported the conditions of CCDC which exposed myself and others to the pervasive risk of harm.

RELIEF

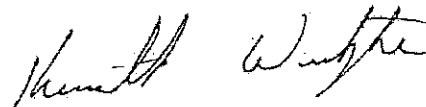
I, Kenneth J. Washington, asked for injunction which Sheriff Harold Jones should refrain from denying inmates in his care adequate medical treatment or care (2.) refrain from not having prescription medication in A secured location in which unlicense and uncertified individual does not have access to in which medication can be stolen and to refrain from not having a license or certified nurse at the facility for inmates who have been arrested with mental illness and injuries during,after and prior to arrest. Refrain from housing inmates in cruel and inhumane condition And colluding to the suitability of a punitive conditions jail with the Knowledge of the same of its pervasive conditions.

(3.) Monetary Damages in the sum of 8,000,000.00 a piece from the

Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 9 of 10

named parties for my mental, emotional distress and my pain and suffering and being housed in conditions that posed a pervasive risk of harm to my future health and being denied adequate medical treatment during my 90 days confined at Copiah County Detention Center which I asked that named parties envisioned what I and others endured Under their administration, which resulted in this civil action.

This the 27th day of April, 2017


Respectfully Submitted

Kenneth J. Washington
Pro-Se

573 Georgetown Street
Hazlehurst, Ms. 39083
Phone No. 601-988-7711

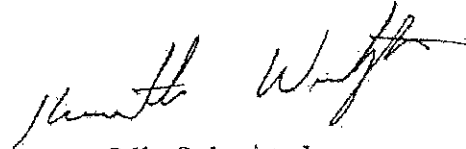
Case 3:16-cv-00629-TSL-JCG Document 78-1 Filed 04/28/17 Page 10 of 10

CERTIFICATE

I, the undersigned Kenneth J. Washington, hereby certify that on this day,
I electronically filed the foregoing with the Clerk of the Court using the
ECF system, and I have mailed via the United States Postal Services a
Copy of the same to the following participant:

William R. Allen
214 Justice Street
P.O. Box 751
Brookhaven, Ms. 39602

Date: April 28, 2017


Respectfully Submitted
Kenneth J. Washington